DOCKET FILE COPY ORIGINAL

Before the
Federal Communication Commission
Washington, D.C. 20554

RECEIVED

APR 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Replacement of Part 90	)	PR Docket 92-235
by Part 88 to Revise	)	
the Private Land Mobile	)	
Radio Services and Modify	)	
the Policies Governing them	)	

92-235

To: The Commission

COMMENT OF

Amelia Roosevelt
6095th Ave West
Rock Springs Wyo 82901

I Amelia Roosevelt submits its comments in response to the Commission's Notice of Proposed Rule Making in this proceeding.

1. In regards to § 88.429, and specifically Table C-3 to be used for systems in the 150-216 MHz and 450-470 MHz segments concerning power and antenna height limits, we have very serious concerns as to the effect on existing and future two-way radio systems. The severe restrictions placed on the Effective Radiated Power will have a serious detrimental effect on the feasibility and practicality of two-way radio systems.

One additional factor should be taken into consideration in formulating the power level charts such as chart C-3. This factor should be the population in an area prescribed by a circle of 75 mile radius from the transmitter. In densely populated areas, the power levels shown in the proposed chart may be a viable solution. In rural, mountainous, and areas of low population, the constraints placed on a two-way radio system by the proposed power levels would place an undo burden on the two-way radio user for no reason. Especially in rural, low population areas, there is not sufficient justification for the drastically decreased transmit power levels. In these areas, the number of two-way radio systems is low enough that system coverage overlap with co-channel users will not be a serious issue as is found in areas of dense population. Users in rural, low population areas generally require two-way radio systems to cover a larger area than those in areas of dense population. Business, public safety, and local government users in rural areas need systems that will cover a large geographical area with the lowest possible number of transmitters in order to make a radio system economically feasible. We would propose a stepped chart similar to that of Chart C-14 with the criteria of service area radius being replaced by a criteria of the population level within a 75 mile radius of the transmitter site. Time limits imposed by the required

No. of Copies rec'd _____
List A B C D E

comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table

to the new specifications and perform coverage tests during periods that will have a less